

**To:** Mia, Marcia[Mia.Marcia@epa.gov]  
**From:** Marsh, Karen  
**Sent:** Mon 3/27/2017 4:12:37 PM  
**Subject:** FW: Subpart OOOOa - Question concerning the applicability of fugitive emission monitoring requirements to specifically described situations

Marcia,

## Ex. 5 - Deliberative Process

Karen

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Karen R. Marsh, PE

US EPA, OAQPS, Sectors Policies and Programs Division

Fuels and Incineration Group

109 TW Alexander Drive, Mail Code E143-05

Research Triangle Park, NC 27711

Direct: (919) 541-1065; email: marsh.karen@epa.gov

**From:** Hambrick, Amy  
**Sent:** Friday, March 17, 2017 3:56 PM  
**To:** Marsh, Karen <Marsh.Karen@epa.gov>  
**Cc:** Thompson, Lisa <Thompson.Lisa@epa.gov>  
**Subject:** FW: Subpart OOOOa - Question concerning the applicability of fugitive emission monitoring requirements to specifically described situations

Karen- I spoke to this guy today and asked that he send his question via email. Let's talk more

Monday. Have a nice weekend.

Amy

**From:** Jay Jones [<mailto:jjj@4peaks.biz>]

**Sent:** Friday, March 17, 2017 2:36 PM

**To:** Hambrick, Amy <[Hambrick.Amy@epa.gov](mailto:Hambrick.Amy@epa.gov)>

**Subject:** Subpart OOOOa - Question concerning the applicability of fugitive emission monitoring requirements to specifically described situations

Ms. Hambrick

Thank you very much for taking my unscheduled call this morning and the time you spent discussing OOOOa requirements regarding fugitive emission monitoring at well sites with me.

To refresh your memory, we discussed that I am confused about whether fugitive emission monitoring is required at the 'typical' oil & gas production site operated by the Companies I work with, which have operations in CO, KS & NE.

My bottom line question is: In each of the scenarios described below, are the collection of fugitive emission components at the well site an affected facility? If so, do components at both the well head and associated tank battery need to be monitored? It is assumed the well site was constructed, re-constructed or modified after 9/8/15. As you will recall, my confusion centers around the interrelationship of the definition of "well site" and the 'exclusion' of well sites that contain one or more wellheads. (60.5365a (i)(2)).

## SCENARIO 1

The 'typical' installation of these production facilities is one well producing crude/condensate which is routed by buried flow line to a tank battery that is at a different physical location. The distance from the well head to the tank battery varies for a variety of reasons, (topography, future drilling plans, land owner agreements, etc.), but

is generally on the order of at least 500' to 2500' or more.

At the well head, the 'typical' equipment in place is a pump jack powered by electricity if available. At some installations a 55-gallon drum of paraffin inhibitor will be present, plumbed to the flow line. Lastly, is the piping / valving arrangement that routes produced fluids to the tank battery.

At the tank battery, the 'typical' installation will be: two, fixed roof stock (oil / condensate) tanks (typically 300 or 400 bbl); a fixed roof produced water tank; a pressurized separator; piping / valving to enable loading of product to truck (load-out equipment); and piping / valving to enable loading of produced water to trucks. Other equipment that may be utilized at the tank battery will be a heater treater if needed.

## SCENARIO 2

Same equipment, but multiple (2 or more) wells, located at different locations routing produced fluids to the distant tank battery.

## SCENARIO 3

Same equipment, but located on a single (contiguous) land disturbance.

Message

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**From:** Witosky, Matthew [Witosky.Matthew@epa.gov]  
**Sent:** 10/12/2017 3:59:57 PM  
**To:** Branning, Amy [Branning.Amy@epa.gov]  
**Subject:** file  
**Attachments:** API Recon petition 2016.pdf

file

Matthew Witosky  
Fuels and Incineration Group  
Sector Policies and Programs Division  
Office of Air Quality Planning and Standards  
EPA, RTP NC

919-541-2865

**To:** Hambrick, Amy[Hambrick.Amy@epa.gov]; Moore, Bruce[Moore.Bruce@epa.gov]; Thompson, Lisa[Thompson.Lisa@epa.gov]; Witosky, Matthew[Witosky.Matthew@epa.gov]  
**Cc:** Howard, Jodi[Howard.Jodi@epa.gov]  
**From:** Mia, Marcia  
**Sent:** Wed 8/17/2016 3:17:23 PM  
**Subject:** FW: 40 CFR 60 Subpart OOOOa  
[removed.txt](#)

## Ex. 5 - Deliberative Process

Marcia B Mia

Office of Compliance/Air Branch

2227A WJCS

U.S. Environmental Protection Agency

202-564-7042

**From:** Bill Schneider [mailto:bill@commengineering.com]  
**Sent:** Wednesday, August 17, 2016 11:03 AM  
**To:** Mia, Marcia <Mia.Marcia@epa.gov>

**Cc:** Andrew Bienvenu <abienvenu@commengineering.com>; Rachelle Suir <rsuir@commengineering.com>; Bill Schneider <bill@commengineering.com>  
**Subject:** RE: 40 CFR 60 Subpart OOOOa

Marcia,

When will you be able to respond to this? Our client has asked us to get your response.

Thanks,  
Bill

**From:** Bill Schneider  
**Sent:** Monday, August 08, 2016 9:27 AM  
**To:** Mia, Marcia <Mia.Marcia@epa.gov>  
**Cc:** Bill Schneider <bill@commengineering.com>; Andrew Bienvenu <abienvenu@commengineering.com>; Rachelle Suir <rsuir@commengineering.com>  
**Subject:** 40 CFR 60 Subpart OOOOa

Marcia,

One of our clients has requested that we get a clarification from you on this:

Based on our understanding of 40 CFR 60 Subpart OOOOa, enclosed combustors used to control emissions from storage vessel affected facilities must have performance tests conducted according to Sections 60.5413a(b) **or** 60.5413a(d).

**As background:**

(FR June 3, 2016 Page 35915-35920) Attached

According to 40 CFR 60.5412a(d) enclosed combustors used to meet emission reduction standards for storage vessel affected facilities must be (or use a control device model **tested under 60.5413a(d)**):

- Installed and maintained in a leak free condition (monthly AVOs)
- Have a continuous burning pilot
- Operated with no visible emissions (pass a monthly Method 22)
- Designed and operated to meet one of the performance requirements A-D.
  - ☐ A – Reduce mass content of VOC by 95% determined in accordance with **60.5413a(b)**
  - ☐ B – Reduce the concentration of TOC in the exhaust to a level equal to or less than 275 ppm in accordance with **60.5413a(b)**
  - ☐ C- Operate at a minimum temperature of 760 Celsius, provided the control devices has demonstrated performance test conducted under **60.5413a(b)**
  - ☐ D – Boiler or process heater used must introduce the vent stream into the flame zone.

Please confirm. Yes.

Thanks,

**Bill Schneider | President**

COMM Engineering

PO Box 53463 | Lafayette, LA 70505

Office: 337.237.4373 Ext 112



Message

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**From:** Pavitt, John [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=31D144BE2F8043A2B6DE245E1706134A-PAVITT, JOHN]  
**Sent:** 1/9/2017 5:03:01 PM  
**To:** McClintock, Katie [McClintock.Katie@epa.gov]  
**CC:** Hedgpeth, Zach [hedgpeth.zach@epa.gov]  
**Subject:** FW: Sci/Tech Scholarships -- proposals due January 20  
**Attachments:** ATT47119; ATT03806; ATT45419; ATT24846; ATT29608; ATT21243; ATT77127

**Ex. 6 - Personal Privacy**

NSPS Subpart

OOOOa impacts gas production fields in Prudhoe Bay. The training spells out what facility operators need to do to check for gas leaks and comply with the rule. Use of Optical Gas Imaging is specifically called out in the rule. We need our own staff to understand what the industry standard is.

Zach, FYI in case you'd like to get this training as well.

## **OGI - OOOOa Fugitive Emissions Monitoring Plan Training**

With the June 3rd Federal Register publication of the Environmental Protection Agency's new methane standard comes a host of new concerns for the Oil and Gas industry: specifically, how to comply with Subpart OOOOa. This new standard, also known as Quad Oa, adds a Leak Detection & Repair (LDAR) component to upstream and midstream operations that is tied to certain new, modified, and reconstructed equipment. Specifically, the rule references Optical Gas Imaging (OGI) technology as the BSER, or Best System of Emission Reduction on specific sources and applies inspection standards to well sites and compressor stations across the United States.

To support operators and service providers to the industry, FLIR is now offering an EPA OOOOa – OGI Monitoring Plan Support course, which will focus on elements required to creating a successful OGI inspection process. This will include interpretations of the standard along with suggestions on inspection parameters that facilities must incorporate into their OOOOa monitoring plans; such as maximum viewing distance, maximum wind speed, and adequate thermal background (Delta T).

The course will be a one-day addition to the existing ITC Optical Gas Imaging course. It is recommended to have attended the standard OGI prior to attending the OOOOa course.

A registration fee of \$595 USD includes course instruction, course materials, continental breakfast and lunch. Please note that prices may vary for courses conducted outside the continental U.S.; please confirm your price with your local ITC course agent.

<http://courses.infraredtraining.com/index.cfm?action=registration.schedule&courseId=24>

John Pavitt  
US EPA Region 10, Alaska Operations Office  
(907) 271-3688



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**From:** Allnutt, David  
**Sent:** Thursday, January 05, 2017 7:54 AM  
**Subject:** Sci/Tech Scholarships -- proposals due January 20

Sent to all Region 10 staff

Region 10 – As the executive co-sponsors of the Regional Science Steering Council, Tony Barber and I wanted to make sure that you were aware of the following opportunity to receive funding to maintain or enhance your scientific and technical expertise. The Sci/Tech scholarship program is currently soliciting applications for funding in 2017. More information about this opportunity follows.

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### **Need training to stay on top of science and technical issues facing Region 10 in the future? Then the Sci/Tech Scholarship is for you.**

**The Sci/Tech scholarship program provides funding for staff to attend classes, take trainings, or participate in conferences that advance the technical and scientific capabilities of our staff for the future.**

If it is a core training for your job, that would come from your unit's travel budget. If it is training that does not address a priority need for the Region, then that would not be funded.

Rather, Sci/Tech is looking for the *training opportunities that fall outside your core training needs but are important for maintaining technical and scientific expertise to meet Regional needs in the future.*

There are plenty of cases like this, and we think making these opportunities happen are important to maintaining our technical edge over time.

#### **Some examples of previously funded requests**

- Rob Elleman - participated in US Forest Service training on the Air Resource Advisor program at the Idaho Operations Office (2016)
- Chris Eckley - attended the American Geophysical Union and Canadian Geophysical Union Joint Assembly meeting in Montreal (2015)
- Tracie Nadeau - attended the Society of Wetland Scientists Conference (2015)
- Dominic Calabro - attended the Green Sports Alliance Summit (2014)
- Bryan Fiedorczyk - attended the American Planning Association Annual Conference (2013)
- Mike McGown - participated in the International Smoke Symposium (2013)

### **Scientific and Technical Scholarship Program - PROCESS**

**Background:** The Scientific/Technical Scholarship Program provides funds to support Region 10 employees in **maintaining their scientific/technical expertise**. To learn more about applying for scholarship funds, please see the second part of this document.

These scholarships supplement the training funds already available to staff through their individual offices for general training needs, and staff should first seek funding for training through their supervisors and office budgets. EPA employees are encouraged, through the scholarship program, to apply for tuition and/or travel support to attend university classes, conferences, or other learning sessions, that go above and beyond what their offices are able to support. To enhance the value of the training experience, scholarship recipients are asked to share their experience with others in the Region. Each year, we will try to offer you an opportunity to apply for scholarship funds. The InfoPage will be used to announce this opportunity and typically, there is a short window in which to complete your application.

**Proposals** must include what costs you are asking to be supported by scholarship funding. You may request scholarship support for all or a portion of the tuition, and any travel/per diem. In order to stretch our scholarship funds and serve as many employees as possible, we encourage you to be creative in looking at cost sharing options. If your office can pay a portion of the travel or training expenses, it is important to note the amount of each type of funding on your application and confirm with your supervisor the amount they are able to commit. Also, the Government Employee Training Act

allows for cost sharing between the employee and the Agency for tuition, travel, and time for attendance at training. See [OPM's Training and Development Policy](#).

**Evaluation:** Applications are evaluated and ranked by members of the Regional Science Steering Council (RSSC), a group of your peers. Although all proposals may be worthwhile, it is not possible to fund all of them. Consequently, it is important to address all of the evaluation criteria. **Please use the application form provided below.** Proposals are due to Bruce Duncan in the Office of Environmental Review and Assessment (M/S OERA-140) by **January 20**. Decisions are made as quickly as possible to coincide with an approved Regional budget and operating plan. Questions may be directed to Bruce Duncan or Rob Elleman in the Office of Environmental Review and Assessment or any member of the RSSC ([visit our webpage](#)).

**APPLICATION PROCEDURES:** Provide the following information to Bruce Duncan in the Office of Environmental Review and Assessment (M/S OERA-140), by January 20<sup>th</sup>.

1.	Proposed class, course or conference including the names of the class, vendor location, and date.
2.	Funding request - tuition and travel (if needed). Describe efforts to reduce your carbon footprint.
3.	Deadlines for registration and other special requirements, i.e., prepayment.
4.	Your supervisor's concurrence.
5.	A narrative statement that addresses, in order, each of the evaluation criteria listed below, as appropriate.

**EVALUATION CRITERIA:** The course, training session, or conference must, at a minimum:

1.	Describe the connection your request has to advancing work related to the Agency/ <u>Region's strategic priorities</u> and/or foundational principles. Provide specific examples of that linkage.
2.	Describe whether and how your request will address a "science need" as identified in the results of the <u>Region 10 Science Steering Council's 2015 Science Needs Survey</u> . The link has tabs for the priority needs across all offices (approx the top 3-5); the Region's top 5 needs; tabs for each office. Information on the Survey can be found by clicking on <b><i>R10 Priority Science Needs</i></b> in the leftmost column
3.	Enhance the employee's expertise in a scientific field or technical area; for example, environmental science, engineering, toxicology, biology, geology, statistics, etc.
4.	Support the Agency's mission or priorities by developing technical expertise in a critical area.
5.	Provide knowledge or expertise that can't be gained through program core training. Any training that is designed to help individuals accomplish the basic tasks of a particular EPA job is core training and the responsibility of the employing office. Examples include basic inspector

	training, permit writer courses, initial training for Superfund RPMs, database training for specific EPA programs, etc.
6.	Provide knowledge or expertise that cannot be gained through a lower cost alternative, such as no-tuition or local training.
<b>IN ADDITION:</b> the following factors will be considered in evaluating applications:	
7.	Does it support the employee in obtaining or maintaining professional certification or licensing?
8.	Has applicant's paper been invited or accepted for presentation (if conference)?
9.	Is it part of the applicant's larger career/training/education framework?
10.	Explain the importance of this experience to the applicant and their potential to be more effective in their current position or how it will enhance and expand their abilities.
11.	Commitment of applicant: Is applicant or applicant's office contributing dollars ( <b>indicate your manager's contribution split into training and travel dollars</b> ); is applicant attending local college or university instead of traveling to a three-day course; is applicant contributing in some other way, i.e., traveling on personal time or other travel reductions? What creative option(s) will the applicant use to reduce our carbon footprint?
12.	Information Transfer--to what extent will this information be shared with others? Does applicant train States or Tribes; participate in work groups, teams, or forums; provide information to the public? This concept goes beyond the requirement to share the information with the Region in some way.
13.	Has applicant recently received scholarship funding? When and for what?
<b>Note:</b> Evaluators may add bonus points to any proposal which demonstrates a special circumstance, unusual initiative, creativity, or commitment.	

### **Tips for Improving Your Scholarship Application**

Read the application procedures carefully. Review each evaluation criterion and be sure to address each one. If you do not answer a question, you cannot get points for that criterion. Below are tips for some of the specific criteria:

#### **Enhance the employee's expertise**

If you are applying to attend a conference, try to be more specific than saying "to keep up with new knowledge in my field." Relate some aspect of the conference as directly as possible to your work or your role within EPA.

**Support the Agency's mission or priorities**

Be as specific as you can about how the training is relevant to the performance of your job or enhances your abilities. If you are trying to learn something new to provide an asset to the Region, describe how the training relates to that objective. Keep in mind that although the review committee has a diversity of program and technical experience, they are not necessarily intimately familiar with the details of your program or your job, so it is up to you to fill in the blanks. While it is fine to include a photocopy of a conference or training brochure, you will benefit from explaining what you, the Region, and the environment stand to gain from your acquiring this training.

**Commitment of applicant or applicant's office**

Describe how you or your office are willing to contribute. Don't just automatically ask for the total amount if you can settle for partial funding, especially if the training is either relatively expensive, or if you are asserting that it is really important for your job. (If you are making the case that you should have this training to do your job, and your office is not willing to contribute toward the funding, that weakens your case.)

**Information Transfer**

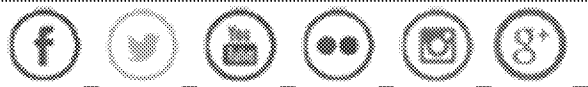
Please note if you can go beyond the minimum requirement. Will you share information with the Region through workgroups or other forums?

**Has applicant received prior scholarship funding?**

Please do not ignore this question. While we try to provide scholarship opportunities for as many staff as possible, you will not necessarily be disqualified if you have received scholarship funding in a prior year(s). Focus on the past 2 years. If you are proposing to take class #4 in a sequence of 6, and EPA funded #2, you could be strengthening the impression of your commitment to a long-range plan.



R. David Allnutt, Director  
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